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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

DANA STEPHENSON,

Plaintiff,

v.

EQUIFAX INFORMATION SERVICES, LLC,

Defendant.

Case No.: 1:22-cv-00024-KMW-MJS

**STIPULATION AND [PROPOSED]
CONSENT ORDER TO EXTEND
TIME TO ANSWER COMPLAINT**

Plaintiff Dana Stephenson (“Plaintiff”) and Defendant Equifax Information Services LLC (“Equifax” or “Defendant”), by and through their respective undersigned counsel, hereby submit this joint stipulation for an extension of time, through and including March 7, 2022¹, to respond to Plaintiff Dana Stephenson’s Complaint. In support of this consent order, the parties represent that:

1. On or about January 3, 2022, Plaintiff filed a Complaint in the United States District Court for the District of New Jersey, entitled *Dana Stephenson v. Equifax Information Services LLC*; Case No. 1:22-cv-000024-KMW-MJS. (Dkt 1)

2. Equifax was served with process via service on its registered agent on January 13, 2022.

¹ March 5, 2022 falls on Saturday.

3. Pursuant to the Federal Rules of Civil Procedure, Equifax's response to Plaintiff's Complaint is currently due on February 3, 2022.

4. Equifax and its counsel require additional time to investigate and respond to the allegations and claims made by Plaintiff. In addition, Equifax intends to engage in good faith settlement discussions with Plaintiff's counsel prior to filing its response to Plaintiff's Complaint. Thus, in the event the parties are not able to resolve this matter, Equifax will need sufficient time to prepare and file its responsive pleading. Accordingly, Equifax respectfully requests an extension of the deadline to respond to Plaintiff's Complaint, up to and including March 7, 2022.

5. This motion is made in good faith, not for purposes of delay, and granting it will not prejudice any party. This extension of time will allow Equifax sufficient time to fully investigate the allegations and claims raised by Plaintiff's Complaint, confer with counsel, and prepare its response. This is Defendant Equifax's first request for an extension of time.

6. There are no status conferences or hearings scheduled that will be affected by this joint stipulation.

WHEREFORE, the parties respectfully request that the Court issue an order granting an extension of time to respond to Plaintiff's Complaint, up to and including March 7, 2022 to answer, move or otherwise respond.

DATED: February 3, 2022

By: /s/ Brian L. Bromberg
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Attorney for Defendant

SO ORDERED,

This _____ day of _____, 2022

HON.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing STIPULATION AND [PROPOSED] CONSENT ORDER TO EXTEND TIME TO ANSWER COMPLAINT was electronically served upon all counsel of record by filing the foregoing via the Court's ECF system.

/s/ Robert T. Szyba

Robert T. Szyba

Counsel for Defendant

Equifax Information Services LLC